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Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

March 28, 2018

Mrs. Katrina Higgins-Coltrain
Remedial Project Manager
US EPA Region 6
LA/OK/NM Section (6SF-RL)
1445 Ross Avenue
Dallas, Texas 75202

RE: Draft Source Control Plan, Wilcox Oil Company Superfund Site, Bristow Oklahoma.

Dear Mrs. Higgins-Coltrain:

The Oklahoma Department of Environmental Quality (DEQ) received a draft copy of the Source Control Plan for the Wilcox Oil Company Superfund Site, Creek County, Bristow, Oklahoma on February 6, 2018. DEQ has completed review of the submitted document and has the following comments. Additional comments are indicated on the attached redline version of the draft Source Control Plan.

Overall, DEQ conceptually agrees with a "worst first" approach and conceptually agrees that a removal will address immediate risks. However, we believe that the approach as written in the draft Interim ROD is premature and needs more work to refine the cost estimate (including a comparison of this to a traditional site-wide approach), more information about waste characteristics and volumes and a more complete approach to the residential properties. Much of this could be managed in a design phase, but it is not clear if there will be a design. We also would like to see an analysis of costs of the action compared to costs for a completed RI/FS and ROD. Our detailed comments follow below.

1. Depending on results of sampling performed in March 2018, hazardous waste requiring treatment prior to transportation or disposal may be present on the site. If this is the case, it could potentially change the volume of material and cost of an early action at the site. Edits to the source control plan would be required. A contingency plan could be incorporated into the Proposed Plan to address this possibility.
2. DEQ has concerns about leaving excavated areas open in the Wilcox processing area if backfilling does not occur in a timely manner post excavation. It is possible that the volume of material requiring excavation for the proposed early action could be greater than estimated. Leaving an open excavation would result in multiple potential hazards and could also cause pollution to ground water. Currently, we have limited groundwater data. DEQ suggests that EPA consider limiting excavation depth (1-2 feet) in the lead



additive area. Based on site data this would address the immediate threat and would avoid certain hazards if deep excavations are not backfilled during this early proposed action.

3. The current plan on tank areas and residential properties is untenable. Work on residential properties is disruptive at a minimum. DEQ strongly recommends that work on residential properties be performed so that they do not have to be revisited at a later date. This would 1) avoid repeated access agreements for additional work 2) build confidence in the agencies and 3) provide piece of mind that the property is safe. With these in mind, it is DEQ's expectation and preference that the following actions be performed in identified tank waste locations for the Lorraine Waste area, North Tank Farm 1 (NTF 1), and residential areas (Tank 1,3,10,11,12, and Pit 1): Extent of tank waste areas excavated to field screening criteria (visual, PID, etc.); confirmation samples collected and submitted for laboratory analysis to verify that screening levels in soil are met; excavation areas backfilled with clean soil once laboratory data verifies that screening levels have been met; and backfilled areas graded to drain and area vegetated. This approach would likely prevent the need to perform additional work on residential properties and where access is not controlled in the Lorraine Waste area.
4. DEQ requests a rewrite of the remedial action objectives. Clean up goals should be applied to media, not waste. Please refer to edits on the attached redline version of the draft Source Control Plan.
5. DEQ believes that waste material is a principal threat waste based on EPA guidance (9380.3-06FS, November 1991) on principal threat wastes.
6. DEQ has concerns that the costs associated with the proposed early action may be over-estimated

DEQ requests a meeting or conference call with EPA to discuss items in this letter and in the attached redline version of the draft Source Control Plan.

Feel free to contact me at (405) 702-5136 or todd.downham@deq.ok.gov with any questions or comments.

Cordially,



Todd Downham
Environmental Program Specialist
Department of Environmental Quality
Site Remediation Section
Land Protection Division

attachment